

CC-21-03594-A
CAUSE NO.

BRENEA PROCTOR	§	IN THE COUNTY COURT
VS.	§	AT LAW NO. ____
TASHKENT, LLC AND JONAS GABRIEL BAPTISTE	§	DALLAS COUNTY, TEXAS

PLAINTIFF'S ORIGINAL PETITION

NOW COMES, Plaintiff, Brenea Proctor, complaining of Defendants, Tashkent, LLC and Jonas Gabriel Baptiste, and for causes of action would respectfully show the Court as follows:

DISCOVERY LEVEL

1. Plaintiff affirmatively pleads that she seeks monetary relief over \$250,000 but not more than \$1,000,000. Discovery is to be conducted under Level 3, Tex. R. Civ. P. 190.4.

PARTIES

2. Plaintiff is an individual resident of Dallas County, Texas.

3. Defendant Tashkent, LLC, is a Maryland business, whose registered agent is Davron Abidov, and may be served at 7202 Chalkstone Dr. Apt. A1, Baltimore, Maryland 21208

4. Defendant Jonas Gabriel Baptiste is an individual resident of Broward County, Florida, and may be served with process at his place of residence, 3353 Dave Blvd., #102, Fort Lauderdale, Florida, 33312, or wherever they may be found.

5. Defendant Jonas Gabriel Baptiste as named in this petition is intended by Plaintiff to indicate the operator of the vehicle involved in the motor vehicle collision with Plaintiff on or about November 11, 2020 in Dallas County, Texas.

VENUE

6. Venue is proper in Dallas County, Texas; all or part of Plaintiff's cause of action arose here.

JURISDICTION

7. Plaintiff seeks damages within the jurisdictional minimum of this Court.

FACTS

8. On or about November 11, 2020, Plaintiff Brenea Proctor was traveling near Service Road of SM Wright and Martin Luther King, Jr. Blvd when she stopped in the left-most left turn lane due to a red light. Defendant, Jonas Gabriel Baptiste, operating a motor vehicle in course and scope of his employment with Defendant Tashkent, LLC, was in the second left turn lane, failed to control his vehicle and struck Plaintiff's vehicle, damaging Plaintiff's vehicle and inflicting injury upon Plaintiff. The collision and injuries to Plaintiff was proximately caused by the negligence of Defendants Tashkent, LLC and Jonas Gabriel Baptiste in the following respects:

- (a) Failure to keep a proper lookout;
- (b) Failure to maintain proper control of the vehicle;
- (c) Failure to sufficiently or properly apply brakes;
- (d) Failure to take proper evasive action to avoid a collision;
- (e) Failure to maintain an assured clear distance between the vehicles;
- (f) Traveling at a rate of speed that was excessive under the circumstances and conditions prevailing at the time of the collision; and
- (g) Driver inattention.

DAMAGES

9. As the result of Defendants' negligence, Plaintiffs suffered injuries. As the result of Defendants' negligence, Plaintiffs have suffered lost wages, pain, suffering, mental anguish, physical impairment, and a diminished capacity to pursue normal activities. Plaintiffs' pain and suffering has continued since the date of the collision and will, in all probability, continue into the future.

10. Plaintiffs received reasonable and necessary medical treatment and health care for the injuries suffered in the collision and will likely continue to receive treatment in the future. As the result of Defendants' negligence, Plaintiffs have incurred fair, reasonable, usual, and customary medical and health-care expenses for that treatment, and will likely incur additional medical expenses in the future.

11. The collision caused damage to Plaintiff's vehicle. Plaintiff thus seeks to recover damages for the loss of use of such vehicle and Plaintiff seeks to recover the difference in the

market value of the vehicle immediately before and immediately after the collision or the reasonable cost to restore the vehicle to the condition it was in immediately before the collision.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiff, Brenea Proctor prays that Defendants, Tashkent, LLC and Jonas Gabriel Baptiste be duly cited to appear and answer herein and that, upon final trial hereof, Plaintiff recovers judgment against Defendants for their damages as set forth above; pre-judgment and post-judgment interest; costs of Court; and such other and further relief to which Plaintiff may be justly entitled, whether at law or in equity.

Respectfully submitted,

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By:


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ATTORNEYS FOR PLAINTIFFS

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Robyn George on behalf of Andrew Scott
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Status as of 8/30/2021 3:29 PM CST

Case Contacts

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